

A Response to: Public Reform Transport Consultation

Issued by: Department for Regional Development

February 2010

Introduction

- 1.1. The Women's Support Network (WSN) welcomes the opportunity to respond to this consultation issued by the Department for Regional Development on Public Transport Reform.
- 1.2. The Women's Support Network (WSN), established in 1989, is an infrastructural umbrella organisation, which provides support services to, and represents 58 community based Women's Centres, women's groups and projects, and women's infrastructure groups and 20 Associate members across Northern Ireland (see Appendix 1).
- 1.3. Our members provide a wide range of women-centred front line services across Northern Ireland, including:
 - Specialist Advice
 - Childcare and Family Support
 - Counselling, Support and Advocacy
 - Complementary Therapies
 - Training & Education
 - Health & Wellbeing Programmes
 - Personal Development & Employment Support
 - Volunteering, Leadership & Empowerment
- 1.4. WSN aims to achieve social, political and economic justice through the promotion of the autonomous organisation of women. The Network aims to strengthen the collective voice of women's groups and to promote and develop networking opportunities, to enable collective action and to impact upon policy and decision making processes. WSN provides an accessible, feminist, relevant and high quality support service and resource for its member groups. The Network is also an important information resource on issues relevant to community based women's organisations and for other infrastructure groups, nationally and internationally.

- 1.5. Over the past 30+ years, the community based women's sector has developed a range of childcare, support, advice, and education & training services in response to the needs they identified at a grass roots level. Women's groups continue to meet the particular needs of women and their children living areas considered to be some of most affected by the conflict, and recognised as some of the most disadvantaged areas across Northern Ireland today.
- 1.6. Network members are actively engaged with their local communities, cross-community initiatives and regional structures throughout Northern Ireland.

2.0 Comments

2.1 WSN welcomes the Department for Regional Development's proposals on reform of public transport in Northern Ireland. WSN wishes to highlight that women face many barriers due to inaccessible and unaffordable transport including inequalities in education and training, access to health care services, childcare and economic life, including employability.¹ Recent research conducted by the Women's Centres Regional Partnership (WCRP) has demonstrated that inaccessible and unaffordable transport particularly impacts on women from disadvantaged communities, acting as a barrier to education, training and work.² Inaccessible and unaffordable transport can particularly impact on rural women. For example in rural areas, transport provision can be inconsistent and expensive. Often transport services are provided at peak times such as morning and mid afternoons to facilitate school times; however there is a lack of transport provision at other times. Furthermore bus routes can result in lengthier journeys in rural areas, much longer than journeys taken by car. This can impact particularly on rural women accessing services who do not have private

¹ See OFMDFMNI *Gender Equality Strategy: A strategic framework for Action to promote gender equality for women and men 2006-2016*, Pg 21. Available at <http://www.ofmdfmi.gov.uk/genderequalitystrategy2006-2018.pdf>. See also Hamilton, K et al (2005) *Promoting Gender Equality in Transport*, Equalities Opportunities Commission. Available at

² Mc Laughlin H (2009) "Women Living in Disadvantaged Communities: Barriers to Participation." Pg 122. Report written on behalf of the Women Centre's Regional Partnership.

transport. Research has also shown that women are less likely than men to have driving licences and use public transport for different purposes than men.³ For example women are more likely to use public transport for journeys to shops or taking children to school, in contrast to men who tend to make journeys on public transport for business.⁴ Hamilton et al notes that bus design does not take into consideration difficulties faced by women who are accompanied by children when travelling or when shopping.⁵

2.2 WSN would like to draw the Department's attention to international human rights law obligations concerning ensuring women's equality with men in accessing transport. Article 14 (h) of The Convention on Elimination on all Forms of Discrimination Against Women (CEDAW) places an obligation on State Parties to eliminate discrimination against women in rural areas in ensuring rural women have access to transport. Furthermore, the Committee on the Elimination of Discrimination Against Women (ComEDAW), responsible for monitoring the implementation of CEDAW highlights "the absence of convenient and affordable transport" as a barrier to accessing health services.⁶ The ComEDAW calls on state parties to ensure adequate living conditions including transport which is critical for "prevention of disease and promotion of good health care."⁷

2.3 WSN urges the Department for Regional Development to give consideration to the barriers faced by women caused by inaccessible and unaffordable transport and in particular to take into account its obligations under CEDAW in its process on the reform of public transport thus ensuring that women have equal access to transport.

³ Breitenbach and Galligan (2004) *Gender Equality Indicators for Northern Ireland: A Discussion Document*, pg available at <http://www.ofmdfmi.gov.uk/gender.pdf>

⁴ Ibid, pg 56.

⁵ Hamilton, K et al (2005) *Promoting Gender Equality in Transport*, Equalities Opportunities Commission, pg iv.

⁶ ComEDAW General Recommendation No 24, The Right to Health (Art 12), para 21. Available at <http://www.un.org/womenwatch/daw/cedaw/recommendations/recomm.htm#recom24>

⁷ Ibid, para 28.

- 2.4** WSN welcomes the Department's proposal of a public transport agency within the department which would have a number of responsibilities including operation policy and co-ordination of regional and local planning, managing the public transport budget, funding concessionary schemes and community and rural transport amongst other responsibilities. Research by Hamilton et al has shown that employment in the transport sector is male dominated and in particular women are under-represented in professional and senior managerial positions in the sector.⁸ Hamilton et al have also highlighted that under-representation of women in planning transport.
- 2.5 WSN urges the Department for Regional Development to ensure women are involved in senior decision making levels within the new public transport agency and to ensure that women are involved in the planning and design of transport systems, particularly local transport planning.**
- 2.6 WSN reiterates the Government's obligations under CEDAW, particularly under Article 7 (b), requiring state parties to ensure women's right to participate in the formulation of government policy. WSN urges the Department for Regional Development to ensure the participation of women in the formulation of public transport policy, thus assisting the Government in meeting its obligations under international human rights law.**
- 2.7** WSN asks the Department for clarification as to whether the new Departmental Agency would be a designated public authority for the purposes of section 75 of the Northern Ireland Act 1998. **WSN recommends that the Departmental Agency is given section 75 status, thus imposing an obligation to promote equality of opportunity on a number of grounds including gender.**

⁸ Hamilton, K et al (2005) *Promoting Gender Equality in Transport*, Equalities Opportunities Commission, Pg vi.

2.8 The Consultation document proposes that the Departmental Agency will be responsible for awarding contracts. WSN believes that equality of opportunity must be considered at every part of the contracting process and in particular equality of opportunity on the grounds of gender and **the Department should stipulate that potential contractors or operators should specify how they will promote equality of opportunity.** WSN draws attention to guidance issued jointly by the Equality Commission for Northern Ireland and the Department of Finance and Personnel on promoting equality of opportunity in public sector procurement. **WSN urges the Department to ensure this guidance is adhered to in any procurement or contracting processes in relation to public transport.**

2.9 WSN welcomes the inclusion of gender profile in the draft Equality Impact Assessment. However we are disappointed that there is not a breakdown in grades in NITHC/Translink, NICS. This information would be useful to ascertain the representation of women particularly in senior decision making levels in these companies and departments. WSN believes that it is difficult to conclude that there are no adverse impacts on any of the groups and that there is no need for mitigation or policy alternatives without such data. **WSN therefore recommends that the Department provides further data in gender profile on the percentages of women and men in all grades in NITHC/Translink and NICS, thus ensuring if information indicates an adverse impact that mitigation or alternative policy proposals will be considered.**

Conclusion

WSN welcomes the opportunity to respond to the Department for Regional Development's consultation on Public Transport Reform. WSN has made a number of recommendations which we hope the Department will consider. We would be happy to discuss further if required.

For further Information, contact:

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Appendix 1

MEMBERSHIP 2009

	<u>Member Group</u>
1	All Ireland Mother's Union
2	An Munia Tober (Travellers)
3	Antrim & Ballymena Women's Aid
4	Ardmonagh Women's Group
5	Ardoyne Women's Group
6	ATLAS Women's Centre
7	Al Nisa Women's Group
8	Ballybeen Women's Centre
9	Ballymurphy Women's Group
10	Belfast & Lisburn Women's Aid
11	Belvoir Women's Improvement Group
12	Carrickfergus Women's Forum
13	Carew II
14	Causeway Women's Aid
15	Chrysalis Women's Centre
16	Clan Mor Women's Group (Sure Start)
17	Derry Well Woman
18	Derry Women's Centre
19	Falls Women's Centre
20	First Steps Women's Group
21	Footprints Women's Centre
22	Foyle Women's Aid
23	Foyle Women's Information Network
24	Granaghant District Women's Group
25	Greenway Women's Centre
26	Kilcooley Women's Centre
27	Lesbian Advocacy Services Initiative
28	Lesbian Line
29	Lenadoon Women's Group
30	Ligoneil Family Centre
31	Link Women's Group
32	Manor Women's Group
33	Markets Women's Group
34	NI Women's Aid Federation
35	NI Women's European Platform
36	Fermanagh Women's Network
37	Newry & Mourne Women
38	Newtownabbey Women's Group
39	Older Women's Network NI
40	Omagh Women's Aid
41	Rape Crisis Centre
42	Rasharkin Women's Group
43	Shankill Women's Centre
44	Strabane & Lifford Women's Centre
45	Strathfoyle Women's Centre
46	The Learning Lodge

47	Voices Women's Group
48	Walkway Women's Group
49	Waterside Women's Centre
50	Windsor Women's Centre
51	Women Connect Project
52	Women into Politics
53	Women's Information Group
54	Women's News
55	Women's TEC
56	Women 2 Gather
57	Women's Resource & Development Agency
58	WISPA (Women in Sport & Physical Activity)
	<u>Associate Members</u>
1.	Ballymena Community Forum
2.	CiNI
3.	Community Relations Forum
4.	East Belfast Community Partnership
5.	Employers for Childcare
6.	HIV Centre (Women's Support Group)
7.	Mencap
8.	National Women's Council of Ireland
9.	Playboard
10.	RNIB (Women's Group)
11.	Good Morning Newtownabbey
12.	Monkstown Community Association
13.	WAVE Trauma Centre
14.	WEA
15.	Parents Advice Centre
16.	Templemore Community Action Group
17.	Gingerbread
18.	Larne Community Development Project
19.	Community First Coaching
20.	Changing Faces